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June 30, 2020

VIA CM/ECF

Honorable Michael A. Hammer, U.S.M.J.
United States District Court for the District of New Jersey
Martin Luther King Building and U.S. Courthouse
50 Walnut Street
Newark NJ 07102

Re: Next Cleaners, LLC v. Mioduszewski et al. /Case No. 17-00222 (MCA) (MAH)

Dear Judge Hammer:

I represent Plaintiff Next Cleaners LLC in this matter. Following up on my letter to the Court dated June 17, 2020 (Dkt. 83) and the Court's Order yesterday scheduling a telephone conference on August 27, 2020 (Dkt. 84) to address Plaintiff's renewed application for discovery, I write to request a brief extension of the June 30, 2020 fact-discovery deadline in this case until at least the end of August, 2020.

On May 18, 2020, the Court extended the fact-discovery deadline in this case. Since that time Plaintiff has tried meet and confer with Defendant Mioduszewski, and subsequently filed its renewed application for discovery. Additionally, Plaintiff and Defendant Simkowitz have drafted a settlement agreement whose specific provisions are being reviewed and approved by the parties.

In order to give the Court and the parties time to resolve Plaintiff's pending application of discovery from entities controlled by Defendant Mioduszewski, and to schedule his deposition (cancelled as a result of the COVID-19 pandemic), Plaintiff requests an extension of the fact discovery deadline through the end of August for the parties to complete discovery and to finalize the settlement with Defendant Simkowitz.

Counsel for Defendant Simkowitz, Mr. Joseph Shapiro, has no objection to this request; Defendant Mioduszewski has not responded to my request for his consent to this request.

Respectfully submitted,
/s/ *Julio C. Gomez*

cc: Defendant Jonathan Mioduszewski, *pro se* (via email)
Joseph Shapiro, Esq., Counsel for Defendant Jon Simkowitz (via CM/ECF)